

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Regional International Corp. and Mead's
Automotive, LLC, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

Espars Inc. and Espars Products Inc.,

Defendants.

Case No. 1:15-cv-01798-JG-JO

**PLAINTIFFS REGIONAL INTERNATIONAL CORP. AND MEAD'S AUTOMOTIVE,
LLC'S MOTION RE: APPOINTMENT OF INTERIM CO-LEAD CLASS COUNSEL
FOR INDIRECT-PURCHASER PLAINTIFFS**

Pursuant to Rule 23(g) of the Federal Rules of Civil Procedure, Plaintiffs Regional International Corp. and Mead's Automotive, LLC respectively move this Court for an order appointing the Law Offices of Francis O. Scarpulla ("Scarpulla Firm") and the firm of Cooper & Kirkham, P.C. ("Cooper & Kirkham") as Interim Co-Lead Class Counsel for the Indirect-Purchaser Plaintiffs in the cases involving anticompetitive activities in the after-market truck heater industry (*Raccoon Valley Transport Inc., et al. v. Espars, Inc., et al.*, No. 1:15-cv-01338-JG-JO (E.D.N.Y.); *Regional International Corp., et al. v. Espars Inc., et al.*, No. 1:15-cv-01798-JG-JO (E.D.N.Y.)), and any subsequently filed Indirect-Purchaser cases.

As described in the accompanying memorandum of law in support hereof, the Scarpulla Firm and Cooper & Kirkham individually and collectively have had extensive experience and success in handling antitrust class actions, can commit the resources necessary to represent the classes through trial, if necessary, and have diligently worked to identify and investigate the potential claims at issue in this litigation.

Accordingly, for the reasons provided above, in the accompanying memorandum of law, the Declaration of Francis O. Scarpulla in Support of Plaintiffs Regional International Corp. and Mead's Automotive, LLC's Motion Re: Appointment of Interim Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs, the Declaration of Josef D. Cooper in Support of Plaintiffs Regional International Corp. and Mead's Automotive, LLC's Motion Re: Appointment of Interim Co-Lead Class Counsel for Indirect-Purchaser Plaintiffs, and for good cause shown, Plaintiffs Regional International Corp. and Mead's Automotive, LLC, respectfully request that the Court appoint the Scarpulla Firm and Cooper & Kirkham as Interim Co-Lead Counsel for the Indirect-Purchaser Plaintiffs.

Dated: May 15, 2015

Respectfully submitted,

By: /s/ Francis O. Scarpulla
Francis O. Scarpulla (*pro hac vice*)

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